## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

IN RE:	§	CHAPTER 11
	§	
KRISJENN RANCH, LLC, KRISJENN	§	<b>CASE NO. 20-50805</b>
RANCH, LLC, SERIES UVALDE	§	
RANCH, KRISJENN RANCH, LLC	§	
SERIES PIPELINE ROW	§	
	§	
DEBTOR	§	

## **DEBTOR'S WITNESS AND EXHIBIT LIST FOR MAY 21, 2020 HEARINGS**

KrisJenn Ranch, LLC, KrisJenn Ranch, LLC Series Uvalde Ranch, KrisJenn Ranch, LLC Series Pipeline Row (the "Debtor"), hereby submits this Witness and Exhibit List for the May 21, 2020, hearing on the following matters:

- 1) Motion for Entry of an Order Authorizing the Debtor-In-Possession to Incur Financing [docket no. 4]
- 2) Motion for Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals [docket no. 6]
- 3) Motion to Sever or Dismiss Cases [docket no. 18].

## I. <u>EXHIBIT LIST</u>

NO.	DESCRIPTION	OFFER	OBJ.	ADMIT DATE	NOT/AD DATE
1.	Operating Agreement dated August 7, 2012				
2.	Miscellaneous Company Invoices				
3.	February 2020 Bank Statement				
4.	Case Headings for Cause No. 2019-355 in District Court of Panola County, Cause No. 19CV34877 in District Court of Shelby County, & Cause No. 19CV35048 in District Court of Shelby County				

5.	Second Loan Modification Agreement		
6.	Assumed Name Certificate.		
7.	30 Day Budget.		
8.	Tax Return		
9.	Any exhibits designated by any other party.		
10.	Any rebuttal exhibits.		
	ARTICLES ON SERIES IN BANKRUPTCY		
A.	Series LLCs, the UCC, and the Bankruptcy Code—A Series of Unfortunate Events?		
В.	The Series LLC: Suggestions for Surviving Some Serious Uncertainties		
C.	A Bankruptcy Litigation Framework for Series LLC Eligibility, Property of the Estate, and Substantive Consolidation		

# II. <u>WITNESS LIST</u>

- 1. Larry Wright, Debtor's Representative
- 2. Any witness called by any other party
- 3. Any rebuttal witnesses

Dated: May 19, 2020

Respectfully submitted,

By: /s/ Ronald J. Smeberg
Ronald J. Smeberg, Esq.
State Bar No. 24033967
MULLER SMEBERG, PLLC
111 W. Sunset Rd.
San Antonio, Texas 78209
210-664-5000 (Tel)
210-598-7357 (Fax)
ron@smeberg.com

ATTORNEY FOR DEBTOR

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing documents were served upon those parties registered in the system; they were also emailed to certain parties in interest, as indicated below, on May 19, 2020.

### **SERVICE LIST**

Christopher S. Johns
Christen Mason Hebert
JOHNS & COUNSEL PLLC
14101 Highway 290 West, Suite 400A
Austin, Texas 78737
512-399-3150
512-572-8005 fax
cjohns@johnsandcounsel.com
chebert@johnsandcounsel.com

Timothy Cleveland
Austin Hammer Krist
CLEVELAND | TERRAZAS PLLC
4611 Bee Cave Road, Suite 306B
Austin, Texas 78746
512-689-8698
tcleveland@clevelandterrazas.com
akrist@clevelandterrazas.com

BURNS & BLACK, PLLC 750 Rittiman Road San Antonio, Texas 78209-5500 Telephone: (210) 829-2022 Facsimile: (210) 829-2021

Email: mblack@burnsandblack.com

Laura L. Worsham Jones, Allen & Fuquay, L.L.P. Dallas Office 8828 Greenville Ave Dallas, TX 75243 Phone: 214-343-7400 Fax: 214-343-7455 lworsham@jonesallen.com

Andrew Seger KEY, TERRELL & SEGER LLP 4825 50th St., Ste. A Lubbock TX 79414 Phone: (806) 792-1944 Fax: (806) 792-2135 aseger@thesegerfirm.com

Shane P. Tobin (USTP)
Office of The United States Trustee
615 E. Houston Street, Suite 533
San Antonio, TX 78205
Shane.P.Tobin@usdoj.gov